UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA PHILADELPHIA DIVISION

In re:

Bankruptcy No. 24-11745-amc

Alison R. Hynds,

Chapter 13

Debtor,
Alan M. Hynds,

Hearing Date: June 24, 2025 Hearing Time: 11:00 A.M.

Co-Debtor.

Hearing Location: 900 Market Street,

Towd Point Mortgage Trust 2018-6, U.S. Bank National Association, as Indenture Trustee,

Philadelphia, PA 19107 Courtroom Number #4

Movant,

v.

Alison R. Hynds,

Debtor/Respondent,

Alan M. Hynds,

Co-Debtor/Respondent,

Kenneth E. West,

Trustee/ Additional Respondent.

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY, RESPONSE DEADLINE AND HEARING DATE

Towd Point Mortgage Trust 2018-6, U.S. Bank National Association, as Indenture Trustee ("Movant") has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1), including costs and disbursements of this action, and for such other and further relief as the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before June 13, 2025, you or your attorney must filed a response to the Motion. (see Instructions on next page).

(a) File an answer explaining your position at: Office of the Clerk, U.S. Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the Movant's attorney:

Sherri R. Dicks, Esquire Robertson, Anschutz, Schneid, Crane & Partners, PLLC 13010 Morris Road, Suite 450 Alpharetta, GA 30004 Telephone: 470-321-7112

Email: sdicks@raslg.com

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the Motion is scheduled to be held before Judge Ashely M. Chan on June 24, 2025, at 11:00 a.m. in Courtroom Number #4, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: 05/29/2025

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Attorneys for Movant 13010 Morris Rd., Suite 450 Alpharetta, GA 30004

Telephone: 470-321-7112 By: /s/ Sherri R. Dicks

Sherri R. Dicks

PA Bar Number 90600 Email: sdicks@raslg.com